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16 Attorneys for WAYMO LLC

17 UNITED STATES DISTRICT COURT

18 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

19 WAYMO LLC,

20 CASE NO. 3:17-cv-00939-WHA

21 Plaintiff,

22 **PLAINTIFF WAYMO LLC'S  
ADMINISTRATIVE MOTION TO FILE  
UNDER SEAL ITS SUPPLEMENTAL  
BRIEF REGARDING MOTION IN  
LIMINE NO. 4**

23 vs.

24 UBER TECHNOLOGIES, INC.;  
25 OTTOMOTTO LLC; OTTO TRUCKING  
26 LLC,

27 Defendants.

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1 Pursuant to Civil L.R. 7-11 and 79-5, Plaintiff Waymo LLC (“Waymo”) respectfully requests  
 2 to file under seal information in its October 23, 2017 Supplemental Brief Regarding Motion *in Limine*  
 3 No. 4 (“Supplemental Brief”) and exhibits thereto. Specifically, Waymo requests an order granting  
 4 leave to file under seal the portions of the documents as listed below:

Document	Portions to Be Filed Under Seal	Designating Party
Waymo’s Supplemental Brief Regarding Motion <i>in Limine</i> No. 4	Portions highlighted	Defendants
Exhibit A to Waymo’s Supplemental Brief	Entire exhibit	Defendants
Exhibit B to Waymo’s Supplemental Brief	Entire exhibit	Defendants
Exhibit C to Waymo’s Supplemental Brief	Entire exhibit	Defendants
Exhibit D to Waymo’s Supplemental Brief	Entire exhibit	Defendants

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11 **I. LEGAL STANDARD**

12 Civil Local Rule 79-5 requires that a party seeking sealing “establish[] that the document, or  
 13 portions thereof, are privileged, protectable as a trade secret or otherwise entitled to protection under  
 14 the law” (*i.e.*, is “sealable”). Civil L.R. 79-5(b). The sealing request must also “be narrowly tailored  
 15 to seek sealing only of sealable material.” *Id.*

16 **II. WAYMO’S SUPPLEMENTAL BRIEF AND ACCOMPANYING EXHIBITS**

17 Waymo seeks to seal the portions of Waymo’s Supplemental Brief and accompanying Exhibits  
 18 A-D because Defendants have designated the information confidential and/or highly confidential.  
 19 Waymo expects Defendants to file one or more declarations in accordance with the Local Rules.  
 20 Declaration of Andrea Pallios Roberts, ¶ 3.

21 **III. CONCLUSION**

22 In compliance with Civil Local Rule 79-5(d), redacted and unredacted versions of the above  
 23 listed documents accompany this Administrative Motion. For the foregoing reasons, Waymo  
 24 respectfully requests that the Court grant Waymo’s Administrative Motion.

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2 DATED: October 23, 2017

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QUINN EMANUEL URQUHART & SULLIVAN,  
LLP

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By /s/ Jordan Jaffe

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Jordan Jaffe

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Attorneys for WAYMO LLC

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